

		* David Kamin... christine@trad... Baker v. Midland, et al.	4 Sep 201...	4 Sep 201...	85 KB
		* Victoria L. Bu... David Kaminski... Re: EXTERNAL: Baker v. Midland, et al.	4 Sep 201...	4 Sep 201...	70 KB
		* David Kamin... Christine Baker,... RE: Baker v. Midland, et al.	4 Sep 201...	4 Sep 201...	95 KB
		* Susie Valiente Christine Baker,... Christine Baker v. Midland Funding, LLC. - Amended Notice of Deposition	5 Sep 201...	5 Sep 201...	330 KB
		* azddb_respo... azddb_nefs@a... Activity in Case 3:13-cv-08169-SPL Baker v. Midland Funding LLC et al Notice of Service of Discovery	5 Sep 201...	5 Sep 201...	6 KB
		* David Kamin... Christine Baker,... RE: Christine Baker v. Midland Funding, LLC. - Amended Notice of Deposition - Sept, 13, 2019 -	9 Sep 201...	9 Sep 201...	37 KB
		* Victoria L. Bu... christine@trad... Baker v Bursey et al.	9 Sep 201...	9 Sep 201...	241 KB
		* David Kamin... Christine Baker,... RE: Christine Baker v. Midland Funding, LLC. - Amended Notice of Deposition - Sept, 13, 2019 -	9 Sep 201...	9 Sep 201...	45 KB
		* David Kamin... Christine Baker,... RE: Baker v. Midland, et al. motion to compel	9 Sep 201...	9 Sep 201...	89 KB
		* Victoria L. Bu... christine@trad... Baker v Bursey et al	10 Sep 20...	10 Sep 20...	370 KB
		* Victoria L. Bu... Christine Baker,... RE: EXTERNAL: Re: Baker v Bursey et al. -- meet and confer re joint discovery motion	10 Sep 20...	10 Sep 20...	82 KB
		* Victoria L. Bu... Christine Baker,... RE: EXTERNAL: Re: Baker v Bursey et al. -- meet and confer re joint discovery motion	10 Sep 20...	10 Sep 20...	99 KB
		* azddb_respo... azddb_nefs@a... Activity in Case 3:13-cv-08169-SPL Baker v. Midland Funding LLC et al Notice (Other)	10 Sep 20...	10 Sep 20...	7 KB
		* Susie Valiente Christine Baker,... Christine Baker v. Midland Funding, LLC., - Rule 68 - Offer of Judgment	10 Sep 20...	10 Sep 20...	245 KB
		* Catherine L. ... christine@trad... Baker/Bursey	10 Sep 20...	10 Sep 20...	8.43 MB
		* David Kamin... Christine Baker Automatic reply: Baker v. Midland, et al. -- joint discovery motion rought draft	11 Sep 20...	11 Sep 20...	14 KB
		* David Kamin... Christine Baker,... RE: Christine Baker v. Midland Funding, LLC. - Amended Notice of Deposition - Sept, 13, 2019 - CANCELLED by Plaintiff	11 Sep 20...	11 Sep 20...	104 KB
		* Victoria L. Bu... Christine Baker,... RE: EXTERNAL: Re: Baker v. Midland, et al. -- joint discovery motion rough draft	11 Sep 20...	11 Sep 20...	50 KB
		* Martin Schan... Victoria L. Buch... RE: EXTERNAL: Re: Baker v. Midland, et al. -- joint discovery motion rough draft	11 Sep 20...	11 Sep 20...	122 KB
		* Victoria L. Bu... Martin Schann... RE: EXTERNAL: Re: Baker v. Midland, et al. -- joint discovery motion rough draft	11 Sep 20...	11 Sep 20...	297 KB
		* Martin Schan... Christine Baker,... RE: EXTERNAL: Re: Baker v. Midland, et al. -- joint discovery motion rough draft	11 Sep 20...	11 Sep 20...	118 KB
		* Victoria L. Bu... christine@trad... Discovery Dispute Statement	11 Sep 20...	11 Sep 20...	85 KB
		* Victoria L. Bu... christine@trad... Monica Derrick	11 Sep 20...	11 Sep 20...	4.01 MB
		* Martin Schan... Christine Baker,... RE: Baker v Bursey / Midlan -- Discovery Dispute Statement	11 Sep 20...	11 Sep 20...	32 KB
		* Martin Schan... Christine Baker,... RE: Baker v Bursey / Midlan -- Discovery Dispute Statement	12 Sep 20...	12 Sep 20...	35 KB
		* Victoria L. Bu... Christine Baker,... RE: EXTERNAL: Re: Baker v Bursey / Midlan -- Discovery Dispute Statement	12 Sep 20...	12 Sep 20...	72 KB
		* Martin Schan... Victoria L. Buch... RE: EXTERNAL: Re: Baker v Bursey / Midlan -- Discovery Dispute Statement	12 Sep 20...	12 Sep 20...	80 KB
		* Martin Schan... Victoria L. Buc... RE: EXTERNAL: Re: Baker v Bursey / Midlan -- Discovery Dispute Statement	12 Sep 20...	12 Sep 20...	1.32 MB
		* azddb_respo... azddb_nefs@a... Activity in Case 3:13-cv-08169-SPL Baker v. Midland Funding LLC et al Motion for Discovery	12 Sep 20...	12 Sep 20...	8 KB
		* Susie Valiente Christine Baker,... Christine Baker v. Midland Funding LLC., et al., - Supplemental Responses to Second Set of Discovery Requests	13 Sep 20...	13 Sep 20...	18.59 MB
		* azddb_respo... azddb_nefs@a... Activity in Case 3:13-cv-08169-SPL Baker v. Midland Funding LLC et al Notice of Service of Discovery	13 Sep 20...	13 Sep 20...	7 KB
		* azddb_respo... azddb_nefs@a... Activity in Case 3:13-cv-08169-SPL Baker v. Midland Funding LLC et al Notice of Service of Discovery	17 Sep 20...	17 Sep 20...	7 KB
		* David Kamin... Christine Baker Automatic reply: Baker v. Midland-- ISSUES with Supplemental Responses to Second Set of Discovery Requests	26 Sep 20...	26 Sep 20...	14 KB
		* David Kamin... Christine Baker,... RE: Baker v. Midland-- ISSUES with Supplemental Responses to Second Set of Discovery Requests	28 Sep 20...	27 Sep 20...	90 KB

Exhibit 2

From: Christine Baker <christine@trado.info>
To: David Kaminski <KaminskiD@cmtlaw.com>, Susie Valiente
<Valientes@cmtlaw.com>
Date: Saturday, September 28, 2019 2:59:10 PM
Subject: Baker v. Midland-- ISSUES with Supplemental Responses to Second
Set of Discovery Requests
Folder: Sent Mail/christine@trado.info

Dear Mr. Kaminski,

TWO WEEKS AGO I wrote:

> Could you PLEASE number all the documents and IDENTIFY what they
> are? I can't even tell which account they pertain to.
>
> I'd also like to know what each redaction is about.

Then we discussed it during our phone call on 9/17 and I explained to you that I need numbered docs so that I can refer to them (COUNTLESS discovery issues and of course to substantiate my claims) and that I can't even tell which account the documents pertain to. You then responded that you don't even know what they are and I suggested you get with your clients.

I got absolutely NOTHING. Not even numbered docs.

Why?

Christine Baker

Friday, September 27, 2019, 10:36:54 PM, you wrote:

Thank you, Ms. Baker. I want to assure you that the documents we served upon you were not filed with the Court. So, there should be no concern about private information being disclosed in a public record. I hope that clarified.

Also, I will call you on Tuesday to further discuss the issues we recently discussed.

Thank you, and Best to you.

Regards,

[David J. Kaminski, Esq.](#)

Partner and Chair of the Financial Services and Class Action Group

CARLSON & MESSER LLP
5901 W. Century Boulevard, Suite 1200
Los Angeles, CA 90045
310-242-2200 Main
310-242-2204 Direct
310-242-2222 Fax

kaminskid@cmtlaw.com

THE INFORMATION CONTAINED IN THIS E--MAIL MESSAGE IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENTS. THIS MESSAGE MAY BE AN ATTORNEY--CLIENT COMMUNICATION, AND AS SUCH IS PRIVILEGED AND CONFIDENTIAL. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY REVIEW, USE, DISSEMINATION, FORWARDING OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. PLEASE NOTIFY US IMMEDIATELY BY REPLY E--MAIL OR TELEPHONE, AND DELETE THE ORIGINAL MESSAGE AND ALL ATTACHMENTS FROM YOUR SYSTEM. THANK YOU.



From: Christine Baker [mailto:christine@trado.info]
Sent: Thursday, September 26, 2019 2:57 PM
To: Susie Valiente <ValienteS@cmtlaw.com>
Cc: David Kaminski <KaminskiD@cmtlaw.com>; Martin Schannong <SchannongM@cmtlaw.com>
Subject: Re: Baker v. Midland-- ISSUES with Supplemental Responses to Second Set of Discovery Requests

9/26/19

Do I have a problem with my email?

Christine Baker

9/17/19

Hello again,

Did I miss your reply?

Christine Baker

9/15/19

Hello all,

Could you PLEASE number all the documents and IDENTIFY what they are? I can't even tell which account they pertain to.

I'd also like to know what each redaction is about.

A number of people now have my personal info, such as the last four digits of my SSN, my DOB, address and phone numbers. That's enough data to cause enormous damages.

What could possibly be more sensitive data than all my personal info?

Sincerely,

Christine Baker

Friday, September 13, 2019, 5:24:49 PM, you wrote:

Dear Ms. Baker:

Attached hereto, please find Defendants Midland Funding LLC., and Midland Credit Management, Inc.'s Supplemental Responses to Second Set of Discovery Requests in the above-entitled matter.

Hardcopies will follow via US Mail.

Sincerely,

Susie A. Valiente, Legal Assistant to:
Steven A. Watkins, Esq.
Martin Schannong, Esq.
Alex A. Wade, Esq.
Calvin W. Davis, Esq.
Carlson & Messer, LLP
5901 West Century Boulevard, Suite #1200
Los Angeles, CA 90045
Office: (310) 242-2200
Direct: (310) 242-2210
Fax: (310) 242-2222

**THE INFORMATION CONTAINED IN THIS E-MAIL IS PRIVILEGED,
CONFIDENTIAL, AND INTENDED ONLY FOR THE PERSONAL USE OF THE
DESIGNATED RECIPIENTS. SENDER DOES NOT CONSENT TO THE**

Victoria Buchinger (#011413)
VBuchinger@dickinsonwright.com
DICKINSON WRIGHT PLLC
1850 North Central Avenue, Ste. 1400
Phoenix, Arizona 85004
Phone: (602) 285-5000
Fax: (602) 285-5100

*Attorneys for Defendants Bursey & Associates PC,
Barry Bursey, Jason LeRoy, Monica Derrick, and Gina Scalese*

David J. Kaminski (*Pro Hac Vice*)
kaminskid@cmtlaw.com
CARLSON & MESSER, LLP
5901 West Century Boulevard, Ste. 1200
Los Angeles, California 90045
Phone: (310) 242-2200
Fax: (310) 242-2222

*Attorneys for Defendants Midland Funding, LLC,
and Midland Credit Management, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Christine Baker,

Plaintiff,

v.

Midland Funding LLC., Midland Credit
Management Incorporated, Bursey &
Associates PC, Barry Bursey, Jason Leroy,
Monica Derrick, Gina Scalese, Equifax
Information Services, LLC,

Defendants.

Case No. 3:13-CV-08169-SPL

OFFER OF JUDGMENT

1 TO PLAINTIFF CHRISTINE BAKER:

2 Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Bursey &
3 Associates PC, Barry Bursey, Jason Leroy, Monica Derrick, Gina Scalese, Midland
4 Funding, LLC, and Midland Credit Management, Inc. ("Defendants") hereby offer to
5 allow entry of Judgment as follows:

6 1. Judgment in favor of Plaintiff Christine Baker ("Plaintiff") and against all
7 Defendants, jointly, in the single total amount of \$30,001.00.

8 2. This Offer of Judgment in the total sum of \$30,001.00 is intended to fully
9 satisfy any and all claims of Plaintiff asserted against all Defendants in this action,
10 including any claim for costs and/or attorney fees.

11 3. This Offer of Judgment is made for the purposes specified in Rule 68 of the
12 Federal Rules of Procedure, and is not to be construed either as an admission that
13 Defendants are liable in this action, or that Plaintiff has suffered any damages.

14
15 DATED: September 10, 2019

DICKINSON WRIGHT PLLC

16
17 s/Victoria Buchinger

Victoria Buchinger

Attorneys for Defendants

*Bursey & Associates PC, Barry Bursey, Jason
LeRoy, Monica Derrick, and Gina Scalese*

18
19
20
21 DATED: September 10, 2019

CARLSON & MESSER LLP

22 s/ David J. Kaminski

David J. Kaminski

Attorneys for Defendant

*Midland Funding, LLC and Midland Credit
Management, Inc.*